



KLESTADT
WINTERS
JURELLER
SOUTHARD &
STEVENS, LLP

200 WEST 41ST STREET
17TH FLOOR
NEW YORK, NY 10036-7203
TELEPHONE (212) 972-3000
TELEFAX (212) 972-2245
WWW.KLESTADT.COM

November 3, 2015

Honorable Carla E. Craig
United States Bankruptcy Court
Eastern District of New York
271-C Cadman Plaza East, Suite 1595
Brooklyn, New York 11201-1800

Re: Campbell v. Citibank, N.A., et al., Case No. 14-45990 (CEC), Adv. Pro. No. 15-01038 (CEC)

Dear Judge Craig:

The New York City Bankruptcy Assistance Project ("NYC BAP") and MFY Legal Services, Inc. ("MFY"), through their undersigned counsel, hereby request permission to file a Brief of *Amici Curiae* in the above-referenced adversary proceeding in opposition to Defendants' Motion to Dismiss Plaintiff's First Amended Complaint [Docket No. 18] (the "Motion").

NYC BAP and MFY's Low-Income Bankruptcy Project provide free bankruptcy assistance and representation to low-income residents of New York City. The issues raised in the Motion, including whether private student loans may be excepted from discharge under Section 523(a)(8)(A)(ii) of the Bankruptcy Code, are of critical importance to the individuals served by NYC BAP and MFY. Bankruptcy Courts, including in this District, have routinely permitted the filing of *Amicus Curiae* briefs. See, e.g., *In re Armstrong*, 408 B.R. 559, 561 (Bankr. E.D.N.Y. 2009), as amended (July 20, 2009); *In re Ginaldi*, 463 B.R. 314, 316 n.1 (Bankr. E.D. Pa. 2011); *In re Cotte*, No. 05-19711, 2009 WL 3753891, at *1 (Bankr. N.D.N.Y. Nov. 5, 2009); *In re Enron Corp.*, 323 B.R. 857, 861 (Bankr. S.D.N.Y. 2005); *In re Carrow*, 315 B.R. 8, 11 (Bankr. N.D.N.Y. 2004).

Thank you for your consideration.

Respectfully submitted,

KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP

/s/Stephanie R. Sweeney

Stephanie R. Sweeney